

**REMARKS**

**Summary**

Claims 1, 2, 5, 8-10, 13, 16, 17 and 20-22 stand in this application. Claims 3, 4, 6, 7, 11, 12, 14, 15, 18, 19, 23 and 24 have been canceled without prejudice. Claims 1, 5, 8, 10, 13, 16 and 22 have been amended. No new matter has been added. Favorable reconsideration and allowance of the standing claims are respectfully requested.

Although Applicant disagrees with the broad grounds of rejection set forth in the Office Action, Applicant has amended claims 1, 5, 8, 10, 13, 16 and 22 in order to facilitate prosecution on the merits.

**35 U.S.C. § 102**

At page 2, paragraph 5 of the Office Action claims 1-2, 4-5, 7-10 and 12-24 stand rejected under 35 U.S.C. § 102 as being anticipated by United States Patent Number (USPN) 5,212,777 to Gove et al. ("Gove"). Applicant respectfully traverses the rejection, and requests reconsideration and withdrawal of the anticipation rejection.

Applicant has cancelled claims 4, 7, 14, 15, 18, 19, 23 and 24 and has incorporated their subject matter into amended independent claims 1, 10, 16 and 22 respectively. Therefore, the rejections with respect to claims 4, 7, 14, 15, 18, 19, 23 and 24 will be addressed below with respect to amended independent claims 1, 10, 16 and 22.

Applicant respectfully submits that to anticipate a claim under 35 U.S.C. § 102, the cited reference must teach every element of the claim. *See* MPEP § 2131, for example. Applicant submits that Gove fails to teach each and every element recited in

claims 1-2, 4-5, 7-10 and 12-24 and thus they define over Gove. For example, with respect to claim 1, Gove fails to teach, among other things, the following language:

a switch to connect said control units to said data paths, said switch to receive configuration information to establish a first set of connections between at least one of said control units and multiple data paths to execute a first process using single instruction multiple data processing with said at least one control unit to control said multiple data paths, and a second set of connections between multiple control units and multiple data paths to execute a second process using multiple instruction multiple data processing with each control unit to control a single data path; wherein said data paths are configured based upon said connections between said control units and said data paths to perform said first process and said second process in parallel.

Applicant respectfully submits that the above recited language of claim 1 defines over Gove.

According to the Office Action, Gove teaches the above recited language of claim 1 at column 1, line 47 to column 3, line 20, column 5, lines 20-56, column 6, lines 6-43, column 7, lines 5-13, column 8, line 42 to column 9, line 13, column 16, lines 6-17, column 61, line 60 to column 652, line 24, Figure 1, Figure 2, Figure 4, Figure 14, Figure 15, Figure 17, Figure 61 and Figure 62. Applicant respectfully disagrees. Applicant respectfully submits that he has been unable to locate any teaching in Gove directed to “a first set of connections between at least one of said plurality of control units and multiple data paths to execute a first process using single instruction multiple data processing with said at least one control unit to control said multiple data paths, and a second set of connections between multiple control units and multiple data paths to execute a second process using multiple instruction multiple data processing with each control unit to

control a single data path...” with said first process and said second process performed in parallel as recited in claim 1.

Applicant respectfully submits that Gove, arguably, teaches a multiprocessor system where each processor can operate to execute the same instruction at the same time (SIMD mode) or different instructions at the same time (MIMD mode). The system of Gove, arguably, is designed to allow switching between the operational modes. Applicant respectfully submits, however, that he has been unable to locate any teaching in Gove directed to operating both SIMD and MIMD modes in parallel and in the specific configuration described above in claim 1. Applicant respectfully submits that Gove, arguably, teaches a “multilink, multi-bus crossbar switch between the individual processors and the individual memories” that “allows the system to perform in both the SIMD and MIMD modes.” Gove at column 3, lines 57-61. Gove, however, does not teach performing the SIMD and MIMD modes in parallel.

Furthermore, Gove at column 6, lines 6-22, teaches that “the system can operate in several operating modes, one of these modes being a single instruction multiple data (SIMD) mode.... The second operational mode is the multiple instruction, multiple data mode (MIMD).... the system can easily switch between operational modes periodically when necessary to operate the different algorithms of the different instruction streams.” Applicant respectfully submits that Gove reference arguably teaches a system that can “switch between operational modes” as necessary, however, Gove fails to teach, suggest or disclose a system wherein the different operational modes can be performed in parallel.

Moreover, even if Gove were to teach operating in both operational modes in parallel, which Applicant does not admit, Applicant respectfully submits that Gove fails to teach, suggest or disclose operating in both modes in the configuration described above in claim 1. Applicant respectfully submits that Gove fails to teach or suggest how to configure a system so that SIMD and MIMD processes may be run in parallel as recited in claim 1. By way of contrast, the claimed subject matter discloses that running SIMD and MIMD processes in parallel is achieved by configuring the data paths based upon the connections between said data paths and the control units.

Applicant respectfully submits that the above recited teaching of Gove is clearly different than the language of amended independent claim 1. Consequently, Applicant respectfully submits that Gove fails to teach, suggest or disclose each and every element recited in claim 1 and removal of the anticipation rejection with respect to claim 1 is respectfully requested. Furthermore, Applicant respectfully requests withdrawal of the anticipation rejection with respect to claims 2, 5, 8 and 9, which depend from claim 1 and, therefore, contain additional features that further distinguish these claims from Gove.

Claims 10, 16 and 22 features similar to those recited in claim 1. Therefore, Applicant respectfully submits that claims 10, 16 and 22 are not anticipated and are patentable over Gove for reasons analogous to those presented with respect to claim 1. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to claims 10, 16 and 22. Furthermore, Applicant respectfully requests withdrawal of the anticipation rejection with respect to claims 13, 17, 20 and 21 that depend from

claims 10 and 16 respectively, and therefore contain additional features that further distinguish these claims from Gove.

Applicant does not otherwise concede, however, the correctness of the Office Action's rejection with respect to any of the dependent claims discussed above. Accordingly, Applicant hereby reserves the right to make additional arguments as may be necessary to further distinguish the dependent claims from the cited references, taken alone or in combination, based on additional features contained in the dependent claims that were not discussed above. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.

It is believed that claims 1, 2, 5, 8-10, 13, 16, 17 and 20-22 are in allowable form. Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

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Examiner: Li, Aimee J.  
TC/A.U. 2183

The Examiner is invited to contact the undersigned at 724-933-9338 to discuss  
any matter concerning this application.

The Office is hereby authorized to charge any additional fees or credit any  
overpayments under 37 C.F.R. § 1.16 or § 1.17 to deposit account 50-4238.

Respectfully submitted,

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/John F. Kacvinsky/

John F. Kacvinsky, Reg. No. 40,040  
Under 37 CFR 1.34(a)

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